

**RCRA Corrective Action
Determination of Remedy Construction
RCRAInfo Code CA550**

Facility Name: GE Industrial of Puerto Rico LLC (formerly Caribe General Electric Products)
Facility Address: San Germán, Puerto Rico
Facility EPA ID#: PRD091019224

Facility Information

GE Industrial of Puerto Rico LLC, formerly Caribe General Electric Products (GEP), San Germán Plant, consists of three (3) buildings of approximately 80,000 square feet on approximately 3.4 acres of land in an industrial area of San Germán, Puerto Rico. Building number one is approximately 35,000 square feet while building number two is approximately 45,000 square feet. Building number three is a storage warehouse of raw material and supplies. The buildings are owned by the Puerto Rico Industrial Development Company (PRIDCO). Building number one is bounded to the north by a half an acre of land which was not in use as of 1989, to the south by "B" Street, to the east by three neighbors from "La Monserrate Development," and to the west by a parking lot. Building number two is bounded to the north by "B" Street, to the south by four neighbors from "La Monserrate Development," to the east by seven neighbors from "La Monserrate Development," and to the west by Pace Analytical Laboratories (former location of Omni Research Laboratories and Digital Equipment Corporation). Building number three is located at the west corner of the area north of "B" Street. The closest surface water bodies are "Rio Guanajibo," located approximately 2,700 feet northwest of the facility, and a small unnamed creek, located approximately 60 feet north of building number one. According to the Soil Survey of Mayaguez area of western Puerto Rico, the site is located in an urban area and sitting on Quaternary alluvium (QaL), which is described in that area as "Clay, silt, sand and gravel in major stream valleys, merges with colluviums along valley walls" (Ref. 1).

The facility manufactures residential circuit breakers and began operations in building number one on December 28, 1969. A second building was constructed in 1982. After 1989, a third building was added to the complex (Ref. 12). The manufacturing process performed at the facility includes in building number one: molding plastic and metal parts, in building number two: welding iron and copper metal to make subassembly (Trip Units), assembly of plastic parts together with welded trip units, and calibrations and packing for final distribution (Ref. 1), and in building number three: as a storage warehouse of raw material and supplies (Ref. 12).

On August 20, 1980, the facility submitted a Notification of Hazardous Waste Activity to the U.S. Environmental Protection Agency (EPA). The Notification was acknowledged on November 7, 1980 and revised June 22, 1983 and August 13, 1985. The Part A Permit Application was received at the EPA on November 19, 1980 and acknowledged on January 15, 1981. On November 3, 1981, a full RCRA Treatment, Storage, and Disposal (TSD) Inspection was performed and the facility was found to be in compliance. Additional Full RCRA TSD Inspections were performed from 1983 through 1989 with some minor violations. On November 3, 1983, the Puerto Rico Environmental Quality Board (EQB) Declassification Approval was granted to change the status from Generator, Transporter, and TSD facility to Generator and TSD Facility. On March 25, 1986, a revised Part A Permit Application was submitted to the EPA. On July 23, 1987, a Part B Application was requested after the facility did not submit the Part B Application Permit. A Closure Plan for the Hazardous Wastes Container Storage Area was submitted on January 10, 1988, revised September 19, 1988, and the completeness determination was made on September 27, 1988. The Closure Plan was public noticed on February 27, 1990. The EQB and EPA

determined the Closure Certification to be complete in 1994 (Ref. 1 and 10). No releases of hazardous wastes/constituents have ever been reported at the facility (Ref. 11).

The wastes generated at the facility, as listed on the January 22, 1988 revised Part A Permit Application, include 275 gallons of D001 waste, process code S01. The original Part A Permit Application, dated November 19, 1980, also listed 125 pounds of F001 wastes, process code S01 (container), and 800 pounds of F017 wastes, process code S01 (Ref. 1 and 4).

Summary of Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs):

In 1989, a RCRA Facility Assessment (RFA) of the Caribe General Electric Products, Inc. facility was completed by Puerto Rico EQB. The RFA identified one SWMU, the Hazardous Waste Container Storage Area (SWMU 1), and one AOC, the Raw Material Storage Area (AOC 1).

SWMU 1 consisted of a shed with a concrete floor and sheet metal roof, located outside building number one at the northwest end of the building. The area was diked and had been used since 1981 for the storage of mixed solvents, used oils paint sludge, and corrosive waste in 55-gallon steel drums. One release was observed in the SWMU during an EQB TSD inspection performed on June 12, 1986 in which “a small spill in the floor under a small tank containing a corrosive solution” which “seemed to come from the tank’s leaking valve” was observed. No evidence of a release was observed during the Visual Site Inspection (VSI) in 1988. The RFA further concluded that the probability of any hazardous waste from the unit reaching soil and groundwater was low (Ref. 1). This SWMU was closed in 1994 upon the approval of EQB and EPA (Ref. 10). No releases of hazardous wastes/constituents have ever been reported at the facility (Ref. 11).

AOC 1 consists of a 3-level metal rack, located outside building number one at the northwest end of the building near former SWMU 1. The area is roofed with metal, does not include walls, and has a concrete floor. A dike completely surrounds the AOC. The AOC stores raw materials mainly in 55-gallon steel drums. No releases associated with the AOC have been reported or observed. The RFA concluded that the probability of any hazardous waste from this unit reaching soil and groundwater was low (Ref. 1)

The RFA recommended no further action for SWMU 1 and AOC 1 (Ref. 1). EPA concurred with this recommendation (Ref. 2).

Clean Closure of SWMU 1

As part of closure activities at SWMU 1 (Hazardous Waste Container Storage Area), sampling of the concrete slab at the SWMU was performed on February 14-15, 1991. Eight concrete samples were collected due to the presence of superficial cracks and stains in the concrete. The sampling point locations were drilled with a hydraulic hammer to a depth of 2.5 inches and a diameter of 12 inches. The samples were analyzed for nine constituents, based on the wastes handled by the facility: ignitability, total cyanide, toluene, acetone, o-xylene, m/p-xylene, ethylene glycol monobutyl ether, methanol, and n-butyl alcohol. The results for ignitability, total cyanide, toluene, acetone, o-xylene, m/p-xylene were reported to be “less than the detectable limits” and “less than the closure plan cleanup criteria” (Ref. 3, 6). Additional information regarding the detection limits for ethylene glycol monobutyl ether, methanol, and n-butyl alcohol was requested by the EQB before closing the site. EQB also requested additional sampling of the concrete slab (Ref. 7). Additional sampling was planned for April 1994 (Ref. 9). EQB completed its review of the Certification of Final Closure Report submitted by Caribe GE Distribution Components, Inc. and the EQB and EPA determined that the Closure Certification was complete on August 23, 1994

(Ref. 8, and 10). It is not anticipated that any environmental media were impacted by SWMU 1 based on the clean closure determination, and the "no further action" recommendation by the RFA. No releases of hazardous wastes/constituents have ever been reported at the facility (Ref. 11).

Determination of Remedy Construction (CA550NR) granted

Based on a review of the information referenced in this document, a determination about "Remedy Construction" has been granted, where no construction is necessary (CA550NR). This designation is due to the fact that clean closure and confirmatory sampling was already implemented on the unit of concern. This determination is expected to be maintained at the GE Industrial of Puerto Rico LLC site, EPA ID# PRD091019224, located at in San Germán, Puerto Rico, under current and reasonably expected conditions. This determination will be re-evaluated when the Agency/State becomes aware of significant changes at the facility.

Submitted by:



David N. Cuevas, Geologist/Project Manager
Response & Remediation Branch/CEPD
EPA Region 2

Date:

9/07/2010

Reviewed by:

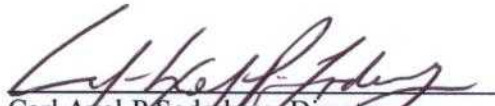


Ariel Iglesias-Portalatin, Branch Chief
Response & Remediation Branch/CEPD
EPA Region 2

Date:

9/8/2010

Approved by:



Carl Axel-P. Soderberg, Director
Caribbean Environmental Protection Division
EPA Region 2

Date:

09-09-10

Locations where references may be found:

References reviewed to prepare this EI determination have been identified under the Facility Information Section. Reference materials are available at U.S. EPA, Region 2.

Contact telephone and e-mail numbers:

David N. Cuevas, Ph.D.
787-977-5856
Cuevas.David@epa.gov

References:

1. RCRA Facility Assessment Report. Prepared by Puerto Rico Environmental Quality Board. August 1989.
2. Correspondence from James Reidy, Chief Caribbean Facilities Section, USEPA, to Flor del Valle, EQB, dated December 29, 1989.
3. Correspondence from Flor del Valle, EQB, to Michael Poetzsch, USEPA. Re: Closure Activities Inspection Report Container Storage Area (CSA). April 2, 1991.
4. Correspondence from Flor del Valle, EQB, to Michael Poetzsch, USEPA. Re: RCRA Facility Assessment Report Revision. June 12, 1991.
5. Correspondence from Michael Poetzsch, USEPA, to Flor del Valle, EQB. Re: RCRA Facility Assessment. July 12, 1991.
6. Correspondence from Jeff Sommer, Caribe GEP, to Doug Pocze, USEPA. Re: CSA Closure. October 21, 1991.
7. Correspondence from Flor del Valle Lopez, EQB, to Milagros Ruiz, Caribe GEP. January 21, 1992.
8. Correspondence from Jeff Sommer, Caribe GEP, to Michael Poetsch, USEPA. Re: Request for Authorization to Amend a Closure Plan. November 30, 1993.
9. Correspondence from Gary UebelHoer, Environmental Consulting and Technology, Inc., to Michael Poetzsch, USEPA, dated February 1, 1994.
10. Correspondence from Robert Berberena Collazo, EQB, to Henry Flores, Environmental Health and Safety Specialist. August 23, 1994.
11. Correspondence from Félix Guerra, Plant Manger GE Industrial of Puerto Rico LLC, San Germán Plant, to David Cuevas-Miranda, USEPA-CEPD. Re: Certification of no releases of hazardous waste or constituents at GE Industrial of Puerto Rico LLC, San Germán Plant. May 5, 2010.
12. Correspondence (electronic mail) from Gloria Toro, PREQB Hazardous Waste Permit Division, to David Cuevas-Miranda, USEPA-CEPD, Re: Updated information on GE Industrial of Puerto Rico LLC, San Germán Plant operations and site description. June 29, 2010.